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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

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NATIONAL LABOR RELATIONS
BOARD,

Plaintiff,

v.

NATURAL LIFE, INC. d/b/a HEART
AND WEIGHT INSTITUTE and
KONSTANTINE STOYANOV,

Defendants.

Case No.: 2:24-cv-01802

**(First Request)
Stipulation to Extend Time to
File Response to Defendant's
Motion to Dismiss**

1 Plaintiff National Labor Relations Board (NLRB), and Defendants Natural Life d/b/a
2 Heart and Weight Institute (Natural Life) and Konstantine Stoyanov (Stoyanov), hereby
3 stipulate pursuant to Local Rule IA 6-1, to extend the NLRB's time to respond to Natural
4 Life's and Stoyanov's Motion to Dismiss filed on November 4, 2024 [Doc 8]. The parties
5 stipulate to a one-week extension thereby making the NLRB's deadline to file its
6 response November 25, 2024, and Natural Life and Stoyanov's deadline to file their
7 Reply to December 9, 2024. This is the first stipulation or motion for an extension of time
8 to file a response to Defendants' Motion. In support of this stipulation or motion, the
9 parties state as follows;
10

11
12 1. On September 25, 2024, the NLRB filed a Complaint pursuant to the Federal
13 Priority Statute [Doc. 1] alleging that Defendants transferred assets to third parties before
14 paying a debt owed to the United States. *Id.*

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16 2. Defendants filed a Motion to Dismiss the NLRB's Complaint on November 4,
17 2024 [Doc 8]. The NLRB's Response to this motion is due November 18, 2024.

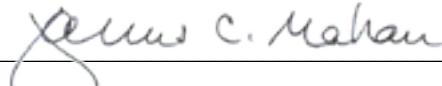
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19 3. The NLRB requires a 7-day extension of time, to and including November 25,
20 2024, to file its response to Defendants' Motion to dismiss due, in part, to an upcoming
21 federal holiday on November 11, 2024, and due to pressing deadlines and other casework
22 in other matters not before this court.

23
24 4. Defendants subsequently require a 7-day extension of time, to and including
25 December 9, 2024, to Reply to the NLRB's response to accommodate Thanksgiving
26 holiday vacation schedules.

27
28 On November 7, 2024, the undersigned counsel conferred and agreed to stipulate to
this extension of time.

1 WHEREFORE, the parties respectfully requests that the Court accept this
2 Stipulation and permit the NLRB to file its Response to Defendants' Motion to Dismiss
3 no later than November 25, 2024 and permit Defendants to file their Reply no later than
4 December 9, 2024.
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11 IT IS SO ORDERED:

12 
13 _____
14 UNITED STATES DISTRICT
15 JUDGE

16 DATED: November 15, 2024
17 _____

18 Dated: November 8, 2024

19 Respectfully submitted,
20 NATIONAL LABOR RELATIONS BOARD
21 ATTORNEYS, PLLC

HOWARD & HOWARD

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